

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

S. JAIN, for herself, and as parent of and for)	
her son "A", a minor,)	
)	Case No. 1:17-cv-0002
Plaintiff,)	
)	Hon. Ronald A. Guzmán,
vs.)	Judge Presiding,
)	
BUTLER SCHOOL DISTRICT 53, <i>et al.</i> ,)	Hon. Sidney I. Schenkier,
)	Magistrate Judge Presiding.
Defendants.)	

**MOTION FOR AN EXTENSION OF TIME WITHIN
WHICH TO FILE FIFTH AMENDED COMPLAINT AT LAW**

NOW COMES the plaintiff, S. Jain, for herself, and as parent of and for her son "A", a minor, by her attorneys, Muslin & Sandberg, through Craig M. Sandberg, moves this Honorable Court, for a one-day extension of time within which to file the plaintiff's Fifth Amended Complaint at Law. In support thereof, the plaintiff states as follows:

1. On September 5, 2017, this Court dismissed the plaintiff's Fourth Amended Complaint at Law. (DE 134)¹
2. The Fourth Amended Complaint (and all prior complaints) was filed by now-former counsel for the plaintiff, Richard Caro.
3. On October 5, 2017, this Court permitted Attorney Craig M. Sandberg to file his appearance (which he did) and for Attorney Caro to withdraw. (DE 165)
4. The plaintiff was granted until today (October 19, 2017) to file her Fifth Amended Complaint. (DE 165)
5. This Court required Attorney Caro to turn over the file to new counsel, which was accomplished last week.

¹ Citations made to the docket will be denoted as "DE ____."

6. With all due diligence and giving all possible preference to the preparation of the complaint, since receiving the file, the undersigned was unable to complete the complaint by today because of the press of other assigned work and other matters.

7. No party and no one will be prejudiced by granting this motion.

WHEREFORE, the plaintiff, S. Jain, for herself, and as parent of and for her son “A”, a minor, respectfully requests this Honorable Court grant her motion and grant a one-day extension of time within which to file the plaintiff’s Fifth Amended Complaint at Law.

Date: October 19, 2017

Respectfully submitted,

MUSLIN & SANDBERG

By: /s/Craig M. Sandberg
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that in accordance with FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

1. Motion for Extension of Time Within Which to File the Plaintiff's Fifth Amended Complaint at Law.

were served pursuant to the district court's ECF system as to ECF filers.

By: /s/Craig M. Sandberg
CRAIG M. SANDBERG